# OFFICIAL FILE ILLINOIS COMMERCE COMMISSION

## ORIGINAL

COMMERCE COMMISSION

Man 22 | 11 29 AM \*00

#### STATE OF ILLINOIS

#### ILLINOIS COMMERCE COMMISSION

ILLINOIS COMMERCE COMMISSION	)	CHIEF CLERK'S OFFICE
On Its Own Motion	)	Docket No. 00-0182
	)	
Rulemaking for 83 Ill. Adm. Code 460	)	
Standards of Service for Meter	)	
Service Providers	)	

#### PETITION FOR LEAVE TO INTERVENE

The People of the State of Illinois, by James E. Ryan, Attorney General of the State of Illinois, ("the People") pursuant to the Rules of Practice of the Illinois Commerce Commission, 83 Ill. Adm. Code, Section 200.200, Petition for Leave to Intervene and be made a party in the above captioned proceeding. In support of this Petition, the People of the State of Illinois state the following:

- The Attorney General represents consumers of electric services within the State of Illinois before this Commission.
- 2. The Attorney General, pursuant to Section 205/6.5(d) of the Attorney General Act, 15 ILCS 205/6.5(d), "shall be a party as a matter of right to all proceedings, investigations, and related matters involving the provision of electric services before the Illinois Commerce Commission...."
- 3. The rulemaking for 83 Ill. Adm. Code Part 460, Standards of Service for Meter Service Providers, is a proceeding involving the provision of electric services.
- 4. The People of the State of Illinois, as consumers of electric services, will be effected by any order by the Commission in this proceeding.

WHEREFORE, for the above stated reasons, the People pray that Leave to Intervene be

granted by the Commission, and that they be made a party to the proceedings in Docket No. 00-0182.

Respectfully submitted,

People of the State of Illinois James E. Ryan

Attorney General of Illinois

Dated: March 21, 2000

R. LAWRENCE WARREN

Senior Assistant Attorney General

Public Utilities Bureau

Public Utilities Bureau 100 West Randolph Street 12" Floor Chicago, Illinois 60601 (312) 814-3873

#### **VERIFICATION**

STATE OF ILLINOIS	)	
	)	SS
COUNTY OF COOK	)	

R. Lawrence Warren being first duly sworn upon oath, deposes and states that he is a Senior Assistant Attorney General, Office of the Attorney General State of Illinois; and that he has read the foregoing **Petition For Leave To Intervene, ICC Docket No. 00-0182,** and knows the contents thereof; and that to the best of his knowledge, information and belief, based upon reasonable inquiry, the said contents are true and correct.

R. Lawrence Warren

Senior Assistant Attorney General

Public Utilities Bureau

SUBSCRIBED and SWORN to before me this 21" day of March 2000.

NOTARY PUBLIC

"OFFICIAL SEAL"

PATRICIA M . MACHALA

NOTARY PUBLIC. STATE OF ILLINOIS

My Commission Expires April 5, 2001

#### STATE OF ILLINOIS

#### **ILLINOIS COMMERCE COMMISSION**

ILLINOIS COMMERCE COMMISSION	)	
On Its Own Motion	)	Docket No. 00-0182
	)	
Revision of 83 Ill. Adm. Code 410	)	

#### **NOTICE OF FILING**

PLEASE TAKE NOTICE that on this date, March 21, 2000, we have filed with the Chief Clerk of the Illinois Commerce Commission the enclosed Petition For Leave To Intervene in the above-captioned docket by delivering it to United Parcel Service for next day delivery to Donna Caton, Chief Clerk of the Illinois Commerce Commission, at 527 East Capitol Avenue, Springfield, Illinois 62794.

R/Lawrence Warren

Senior Assistant Attorney General

#### **CERTIFICATE OF SERVICE**

I, R. Lawrence Warren, a Senior Assistant Attorney General, hereby certify that I served the above identified documents upon all active parties of record on the attached service list by United States Mail, first class postage prepaid on March 21, 2000.

R. Lawrence Warren

Senior Assistant Attorney General

R. Lawrence Warren Senior Assistant Attorney General 100 West Randolph Street, 1 1<sup>th</sup> Floor Chicago, Illinois 60601 (312) 814-3873

### SERVICE LIST ICC Docket No. 00-0182

Nick T. Shea, Director, Rates & Regulatory Affairs Central Illinois Light Company 300 Liberty Street Peoria, Illinois 61602

Robert J. Mill Central Illinois Public Service Company 607 East Adams Street Springfield, Illinois 62739

Steven R. Sullivan Vice President One Ameren Plaza 1901 Chouteau Avenue P. 0. Box 66149, MC 1300 St. Louis, MO 63166-6149

Pamela B. Strobe1 Senior Vice President Commonwealth Edison P.O. Box 767 Chicago, Illinois 60690-0767

Gary R. Shannahan, Manager Beth O'Donnell, Attorney Randy W. Clemens, Attorney Illinois Power Company 500 South 27<sup>th</sup> Street Decatur, Illinois 62525

Kent M. Ragsdale Staff Counsel 11470 Industrial Avenue P. 0. Box 6026 Galena, Illinois 61036-6026 David Eley South Beloit Water, Gas & Electric Company 12014 Waxwing Court Roscoe. Illinois 61703

Edward M. Gleason Corporate Secretary 222 West Washington Avenue P. 0. Box 192 Madison, WI 53701-0192

Michael S. Gillson Manager 500 East Broadway East St. Louis, Illinois 62201

Sherman Elliott Illinois Commerce Commission 527 East Capitol Avenue Springfield, Illinois 62794-9280

Christopher J. Townsend David I. Fein & Karen S. Way Piper Marbury Rudnick & Wolfe 203 North La Salle Street Suite 1800 Chicago, Illinois 60601-1293

Sue Landwehr Enron Energy Services, Inc. 5402 Parkdale Drive Suite 104 Minneapolis, MN 55416 Jeff Schirm MidAmerican American 7 16 17<sup>th</sup> Street Moline, Illinois 61265

Robert P. Jared Jared Regulatory & Analysis MidAmerican Energy Company 106 East Second Street P. 0. Box 4350 Davenport, IA 52808

Eric Bramlet
Mt. Cannel Public Utility Co.
Koger & Bramlet, P.C.
3 16 ½ Market Street
P. 0. Box 278
Mt. Cannel, Illinois 62863

Carl Peterson Illinois Commerce Commission 160 North La Salle Street Suite 800 Chicago, Illinois 60601-3104

David L. Nixon & Richard Favoriti Office of General Counsel Illinois Commerce Commission 160 North La Salle Street Suite 800 Chicago, Illinois 60601-3104

Bryan S. Anderson John E. Rooney & Cynthia A. Fooner Hopkins & Sutter 70 West Madison Street Suite 4100 Chicago, Illinois 60602 Edward J. Griffin W. Michael Seidel Defrees & Fiske 200 South Michigan Avenue Suite 1100 Chicago, Illinois 60604

Linda Buell & Joe Clennon Office of General Counsel Illinois Commerce Commission 527 East Capitol Avenue Springfield, Illinois 62794-9280

Bob Garcia Illinois Commerce Commission 160 North La Salle Street Suite 800 Chicago, Illinois 60601-3104

Steven Walter City of Chicago Dept. of Environment 30 North La Salle Street Suite 2500 Chicago, Illinois 60602

Leijuana Doss Assistant State's Attorney 69 West Washington Street Suite 700 Chicago, Illinois 60602

Terry B. Nicolai Alliant Energy Corporate Services 222 West Washington Avenue P. 0. Box 192 Madison, WI 53701-0192 Gregory C. Locke Michael Struebing Blackhawk Energy Services N16W 23217 Stone Ridge Drive Waukesha, WI 53 188

Charles A. Werner Schuchat, Cook & Werner 1221 Locust Street, 2<sup>nd</sup> Floor St. Louis, MO 63103-2364

Joseph H. Raybuck Ameren Services Company 1901 Chouteau Avenue P. 0. Box 66149 St. Louis, MO 63166-6149

James Hinchliff & Gerald Fox Mary Klyasheff & Timothy P. Walsh Attorneys for Peoples Energy Services Corporation 130 East Randolph Drive, 23<sup>rd</sup> Floor Chicago, Illinois 60601

Eric Robertson & Edward C. Fitzhenry Lueders, Robertson & Konzen 1939 Delmar Avenue P. 0. Box 735 Granite City, Illinois 62040-0735

Ronald D. Jolly Alan H. Neff City of Chicago Department of Law 30 North La Salle Street Suite 900 Chicago, Illinois 60602 Philip R. O'Connor NEV Midwest, L. L. C. 29 South La Salle Street Suite 900 Chicago, Illinois 60603

Richard Balough Robert J. Kelter Citizens Utility Board 208 South La Salle Street Suite 1760 Chicago, Illinois 60604

Christopher W. Flynn Attorney for CIPS/UE Jones, Day, Reavis & Pogue 77 West Wacker Chicago, Illinois 60601-1692

Michael A. Munson Attorneys for Intervenors 150 North Michigan Avenue Suite 1405 Chicago, Illinois 60601

Kate Siddon Illinois Commerce Commission 160 North La Salle Street Suite 800 Chicago, Illinois 60601-3104

Terrence L. Barnich New Paradigm Resources Group 12 South Michigan Avenue 5" Floor Chicago, Illinois 60603 Mark T. Mitchell Vice President Meter Corporation One Twin Dolphin Drive Redwood City, CA 94062

Michael W. Hastings Association of Illinois Electric P. 0. Box 3787 Springfield, Illinois 627083787

Jerry Tice Grosboll, Becker, Tice & Smith P. 0. Box 530 Petersburg, Illinois 62675

Stephen J. Mattson Joseph P. Weber Attorneys for Northern Illinois Gas Company d/b/a Nicor Gas Mayer, Brown & Platt 190 South La Salle Street Chicago, Illinois 60603

Charles V. Garcia H. Ward Camp Charles Gunter Avistar, Inc. d/b/a PHASER Advanced Alvarado Square, MS -0806 Albuquerque, NM 87 158

Daniel J. Kucera Joanna C. Kitto Chapman and Cutler 111 West Monroe Street Chicago, Illinois 60603-4080 Chris S. King Chief Executive Officer 828 San Pablo Avenue Suite 115 Albany, CA 94706-1678

Richard Favoriti
Office of General Counsel
160 North La Salle Street
Suite 800
Chicago, Illinois 60601-3104

Sanford J. Asman Itron, Inc. Star Data Services 570 Vinington Court Dunwoody, GA 30350

Koby A. Bailey Nicor Inc. 1844 Ferry Road Naperville, Illinois 60563

Lee Kuhl, Amos Tsikayi Rob Jenkins, Tom Gallegos Tom Norton FirstPoint Services Inc. 1001 SW 5" Avenue, Suite 500 Portland, OR 97204

Rob Jenkins Chief Financial Officer Teldata, Inc. 25 East Wacker Drive Chicago, Illinois 60601-2206 George C. Roberts Schlumberger Resource Management Services, Inc. 5430 Metric Place Norcross, GA 30092

Nancy Hetrick
Director, State Government Affairs
Enron Corp.
1400 Smith Street
Houston, TX 77002-7361

Jeff Brown, Director Enron Corp. 400 Professional Park Drive Goodlettsville, TN 37072

John Hester Illinois Commerce Commission 160 North La Salle Street Suite 800 Chicago, Illinois 60601-3104

Elizabeth Perez-O'Dess Manager of Regulatory Analysis CellNet Data Systems, Inc. 125 Shoreway Road San Carlos, CA 94070

Rebecca J. Lauer, Deputy General Counsel Commonwealth Edison Company P. 0. Box 767 Chicago, Illinois 60690-0767 Troy A. Fodor & E.M. Fulton, Jr. Troy A. Fodor, P.C. 913 South Sixth Street Springfield, Illinois 62703

Ronald D. Earl Illinois Municipal Electric Agency 919 South Spring Street Springfield, Illinois 62704

Kathy Smith, Project Engineer Kate Shiring, Marketing Rep. ABB 208 South Rogers Lane Raleigh, NC 276 10

Kathy Lipp Director - Regulation and Restructuring Alliant Energy 222 West Washington Avenue P. 0. Box 192 Madison. WI 53701-0192

William H. Starr
Business Manager, Financial Sec.
IBEW Local Union No. 15
133 Butterfield Road
Suite 280
Downers Grove, Illinois 605 15

Dominic Rivara
Business Manager & Financial Sec.
IBEW Local Union No. 15
301 East Spruce Street
Springfield, Illinois 62703

Joseph T. Clennon & Linda M. Buell Office of General Counsel Illinois Commerce Commission 527 East Capitol Avenue Springfield, Illinois 62794

Christel Templeton, Case Manager Illinois Commerce Commission 527 East Capitol Avenue Springfield, Illinois 62794

Marie Spicuzza Leijuana Doss Environment and Energy Division Cook County State's Attorney Office 69 West Washington Suite 700 Chicago, Illinois 60602

Simone Byvoets Commonwealth Edison Company 125 South Clark Street Chicago, Illinois 60602

Kent M. Ragsdale
Managing Attorney
Interstate Power Company
South Beloit Water, Gas & Electric Company
& Alliant Energy Resources
200 First St., SE
P. 0. Box 351
Cedar Rapids, IA 62406-0351

Christopher T. Hexter Charles Werner AFLO-CIO, Local Union No.15&51 Schuchat, Cook & Werner 1221 Locust Street 2<sup>nd</sup> Floor St. Louis, MO 63103

Gary Roan Business Manager IBEW Local Union No. 702 106 North Monroe Street West Frankfort, Illinois 62896

Kevin Bennett Business Manager IBEW Local Union No. 1306 363 North Sims Drive Decatur, Illinois 62523

Michael Wallace Hearing Examiner 527 East Capitol Avenue Springfield, Illinois 62794